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1 mischaracterizes the testimony.

2 Q. (By Mr. Quainton) The -- sorry, the person who asked
3 you to source the GateGuard intercom would have asked you at
4 some time prior to the time when you made this entry in -- in
5 the Chime conversation that we see recorded on March 3rd,
6 right?

7 A. Correct.

8 Q. Do you recall how long before you wrote, you know,
9 https://gateguard.xyz you had been asked to --

10 A. I do not.

11 Q. (By Mr. Quainton) -- to --

12 MR. BELELIEU: Let him finish the question.

13 Q. (By Mr. Quainton) -- you asked him to source the
14 GateGuard intercom?

15 A. I do not recall.

16 Q. Do you recall whether it was a matter of days or --
17 or weeks, if any? Any sense of the timing?

18 A. I don't recall.

19 Q. And you're -- I think what you -- what you testified
20 to is that you were asked to source the device for
21 compatibility testing; is that correct?

22 A. Correct.

23 Q. Were you given any other instructions that, you know,
24 accompanied the direction that you source the device --
25 GateGuard device?

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1 to source two devices?

2 A. I can't say that I recall my thought process back
3 then, but one would be going to Las Vegas, and one was going
4 to the engineering team.

5 Q. So the -- and the engineering team was in -- in
6 Sunnyvale, right?

7 A. Correct.

8 Q. And the other team, what was the -- what was the
9 nature of the other team that would get the second device?

10 A. The install operations team in Las Vegas.

11 Q. And do the -- does the install operations team in Las
12 Vegas have testing equipment to test compatibility of devices?

13 A. Yes, sorry.

14 MR. BELELIEU: Object to the form. You can answer.

15 THE WITNESS: Sorry, I was just going to say, yes, we
16 have means of compatibility testing.

17 Q. (By Mr. Quainton) Okay. So then going down, two
18 minutes later you say, "Remember that what we discussed was
19 confidential, so do not share with Matt." Do you see that?

20 MR. BELELIEU: It says "remainder," not "remember,"
21 just to correct that.

22 Q. (By Mr. Quainton) Okay. "Reminder that what we
23 discussed was confidential, so do not share with Matt." Do
24 you see that?

25 A. Yes.

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1 MR. BELELIEU: Object to the form. You can answer.

2 THE WITNESS: I am not sure what you mean by
3 directions. I was asked --

4 Q. (By Mr. Quainton) Sorry, go ahead.

5 A. Sorry, go ahead.

6 Q. Well, let me ask it this way: Do you recall anything
7 else about -- well, let's backtrack.

8 Do you recall whether the person who asked you to
9 source the GateGuard device communicated with you in writing?

10 A. I don't recall.

11 Q. Okay. Do you recall whether -- other than asking you
12 to obtain a device for compatibility testing, do you recall
13 whether the person who asked you to obtain the device
14 mentioned anything else about the GateGuard device that you
15 were asked to source?

16 A. I was just asked to source the two for compatibility
17 testing. One was to be sent to our engineering team in San
18 Jos and one to Las Vegas.

19 Q. So the person who asked you to source the
20 GateGuard -- I guess intercom -- asked you to source two
21 devices, correct?

22 A. Correct.

23 Q. And did the person say why you needed two devices?

24 A. No, it was just an ask for -- to source two.

25 Q. And did you -- did you wonder why you had been asked

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1 Q. And do you know who Matt is?

2 A. I do not recall who Matt is. I don't know if that's
3 -- I'm not sure who that is. I don't recall anybody on the
4 internal team that had the name Matt.

5 Q. Did people -- do people ever use, you know, aliases
6 in your team?

7 A. I'm sorry, what do you mean by aliases?

8 Q. You know, in other words, you don't recall anybody
9 named Matt. Is it possible that somebody was not named Matt,
10 but there was somebody who was referred to as Matt?

11 A. I -- I don't recall who Matt is.

12 Q. But it says, "Reminder we -- what we discussed was
13 confidential, so do not share with Matt." Do you recall what
14 you discussed -- sorry, let me back up. When it says,
15 "Remainder that what we discussed," now, this is what you
16 discussed with Mr. Aguilar, right?

17 A. Correct.

18 Q. And whatever you discussed was confidential, right?

19 A. I think I mentioned that just, yeah, keep it to
20 himself and not share with this individual.

21 Q. Do you remember what it was that you discussed that
22 was confidential?

23 A. I don't recall the specific nature of the
24 conversation -- you know, general conversations around
25 ordering the system -- the GateGuard systems.

7 (Pages 22 to 25)